

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALEX E. RINEHART, On Behalf of :
Himself And All Others Similarly Situated, :
 :
Plaintiff, :

VS.

Civil Action No: 08 Civ. 5598 (MGC)

LEHMAN BROTHERS HOLDINGS INC.,
Richard S. Fuld, Jr., Michael L. Ainslie,
John F. Akers, Roger Berlind, Thomas H.
Cruikshank, Marsha Johnson Evans,
Christopher Gent, Roland A. Hernandez,
Henry Kaufman, John D. Macomber, Erin
M. Callan, Wendy M. Uvino, The
Employee Benefit Plans Committee, and
John Does 1-10,

Defendants.

JO ANNE BUZZO, individually and on :
behalf of all others similarly situated, :
 :
 :
Plaintiff, :
 :
vs. :
 :

Civil Action No: 08 Civ. 6245 (UA)

LEHMAN BROTHERS HOLDINGS INC., :
Wendy M. Uvino, Lehman Brothers :
Holdings Inc. Employee Benefit Plans :
Committee, John Does 1-10, Henry :
Kaufman, John F. Akers, Roger S. Berling, :
Marsha Johnson Evans and Roland A. :
Hernandez. :
:
:
Defendants.

MONIQUE MILLER FONG, On Behalf Of :
Herself And All Others Similarly Situated, :
 :
Plaintiff, :
 :
vs. :
 :

Civil Action No: 08 Civ. 6282 (UA)

LEHMAN BROTHERS HOLDINGS INC., :
 RICHARD S. FULD, JR., MICHAEL L. :
 AINSLIE, JOHN F. AKERS, ROGER S. :
 BERLIND, THOMAS H. CRUIKSHANK, :
 MARSHA JOHNSON EVANS, SIR :
 CHRISTOPHER GENT, JERRY A. :
 GRUNDHOFFER, ROLAND A. :
 HERNANDEZ, HENRY KAUFMAN, :
 JOHN D. MACOMBER, ERIN M. :
 CALLAN, WENDY M. UVINO, THE :

EMPLOYEE BENEFIT PLANS :
COMMITTEE, and JOHN DOES 1-10, :
 :
Defendants. :
-----X

**NOTICE OF MOTION AND MOTION FOR CONSOLIDATION OF RELATED
ACTIONS AND FOR APPOINTMENT OF INTERIM LEAD PLAINTIFF,
INTERIM LEAD COUNSEL AND INTERIM LIAISON COUNSEL**

PLEASE TAKE NOTICE THAT Plaintiff Jo Anne Bozzo (“Plaintiff” or “Buzzo”) hereby moves this Court for the entry of [Proposed] Pretrial Order No. 1 submitted to the Court herewith which:

1. Consolidates the above captioned actions;
2. Appoints Buzzo as Lead Plaintiff for the Lehman Brothers Savings Plan (“Plan”) and on behalf of a class of participants and beneficiaries of that Plan (“Participants”);
3. Appoints Izard Nobel L.L.P. (“Izard Nobel”) Interim Lead Counsel for the ERISA class plaintiffs;
5. Appoints Sarraf Gentile L.L.P. (“Sarraf Gentile”) as Interim Liaison Counsel for the ERISA class plaintiffs.

WHEREFORE, for the reasons set forth in the supporting documents filed herewith, Plaintiff respectfully requests that this Court grant this motion and enter the [Proposed] Pretrial Order No. 1 submitted to the Court herewith.

Dated: July 15, 2008

Respectfully submitted:

SARRAF GENTILE LLP

By: /s/ Ronen Sarraf
Ronen Sarraf
Joseph Gentile
11 Hanover Square, 2nd Floor
New York, NY 10005
Telephone: (212) 868-3610
Facsimile: (212) 918-7967
ronen@sarrafgentile.com
joseph@sarrafgentile.com

Robert A. Izard
IZARD NOBEL LLP
20 Church St., 17th Floor
Hartford, CT 06103
Telephone: (860) 493-6293
Facsimile: (860) 493-6290
rizard@izardnobel.com

Major Khan
MAJOR KHAN LLC
20 Bellevue Terrace
Weehawken, NJ 07086
Telephone: (646) 546-5664
Facsimile: (646) 546-5755
mk@mk-llc.com

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2008: (i) a true and correct copy of the foregoing motion and accompanying papers were electronically filed using the Court's ECF system which will send a notification of such filing to all users of the ECF system; (ii) a true and correct copy of the [Proposed] Pretrial Order No. 1 was emailed to judgments@nysd.uscourts.gov; and, (iii) a true and correct copy of the same was served by U.S. Mail upon the following:

Jonathan K. Youngwood
Simpson Thatcher & Bartlett LLP
425 Lexington Avenue
New York, NY 10017-3954

/s/ Ronen Sarraf